

FILED 12 JUL '23 12:54 USDC-ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:23-cr-00230-HZ

v.

INDICTMENT

AVERI ROSE DICKINSON

Defendant.

**21 U.S.C. §§ 331(i)(3), 333(b)(8),
841(a)(1), 841(b)(1)(C), 841(b)(1)(E)(i),
843(b), 843(d)(1), 846, 856(a)(1), 856(b),
859(a), 861(a), and 861(b)**

**18 U.S.C. §§ 922(j), 924(a)(2), 924(c),
2320(a)(4), and 2320(b)(3)**

Forfeiture Allegations

THE GRAND JURY CHARGES:

COUNT 1

**(Conspiracy to Distribute and Possess with Intent to
Distribute Controlled Substances)**

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 841(b)(1)(E)(i), and 846)

Beginning on or about January 2023, the exact date being unknown to the Grand Jury,
and continuing through on or about June 14, 2023, within the District of Oregon, defendant
AVERI ROSE DICKINSON did knowingly and intentionally combine, conspire, confederate,
and agree with others both known and unknown to the Grand Jury, to carry out the following
objects in furtherance of the conspiracy:

///

///

Indictment

Objects of the Conspiracy

The defendant, and others known and unknown to the grand jury, did knowingly and intentionally combine, conspire, confederate, and agree to distribute and possess with the intent to distribute various Schedule I, Schedule II, and Schedule III controlled substances, to include:

1. Lysergic Acid Diethylamide (LSD), commonly known as “acid,” a Schedule I controlled substance;
2. 3,4-Methylenedioxymethamphetamine (MDMA), commonly known as “ecstasy” and “molly,” a Schedule I controlled substance;
3. Oxycodone, a Schedule II controlled substance;.
4. Cocaine, a Schedule II controlled substance; and,
5. Ketamine, a Schedule III controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C), and 841(b)(1)(E)(i).

Manner and Means of the Conspiracy

The defendant, working with others known and unknown to the grand jury, ran a drug trafficking group that utilized Telegram, Snapchat, and Instagram to advertise and distribute controlled substances within the District of Oregon. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

1. Defendant **AVERI ROSE DICKINSON**, as the organizer, leader, manager, and supervisor of the drug distribution group would utilize Telegram, Snapchat, and Instagram to advertise and distribute controlled substances within the District of Oregon.

///

2. Defendant **AVERI ROSE DICKINSON** would, within the District of Oregon, receive controlled substances from her source of supply for purposes of further distribution.

3. Defendant **AVERI ROSE DICKINSON** would, within the District of Oregon, transport, store, repack, conceal, possess with the intent to distribute, and then distribute controlled substances.

4. It was part of this conspiracy for defendant **AVERI ROSE DICKINSON** to utilize encrypted messenger applications, a cellular telephone, and text messaging services to communicate and further the distribution and possession with the intent to distribute controlled substances.

5. It was part of this conspiracy for defendant **AVERI ROSE DICKINSON** to maintain premises in Damascus, Oregon for the purposes of storing, packaging, possessing with the intent to distribute, and distributing controlled substances.

6. It was part of this conspiracy for defendant **AVERI ROSE DICKINSON** to utilize her vehicle to distribute controlled substances to customers.

7. Defendant **AVERI ROSE DICKINSON** employed people to distribute controlled substances to customers.

8. It was part of this conspiracy for defendant **AVERI ROSE DICKINSON** to possess one or more firearms as protection and in furtherance of her drug trafficking activities.

Overt Acts

In furtherance of this conspiracy, and to effect and accomplish its objectives, the defendant and other co-conspirators committed one or more of the following overt acts within the District of Oregon:

1. Defendant **AVERI ROSE DICKINSON** maintained an account on Telegram and operated as an administrator for “Kiki’s Delivery Service” for the purposes of advertising and distributing controlled substances.

2. Defendant **AVERI ROSE DICKINSON** maintained and operated a Snapchat account for the purposes of advertising and selling controlled substances.

3. Defendant **AVERI ROSE DICKINSON** maintained and operated an Instagram account for the purposes of advertising and selling controlled substances.

4. Defendant **AVERI ROSE DICKINSON** maintained premises in Damascus, Oregon for the purposes of storing, packaging, possessing with the intent to distribute, and distributing controlled substances.

5. Defendant **AVERI ROSE DICKINSON** distributed controlled substances to customers.

6. Defendant **AVERI ROSE DICKINSON** directed her employees to distribute controlled substances to customers.

7. Defendant **AVERI ROSE DICKINSON** possessed a Glock pistol in furtherance of her drug trafficking activities.

8. Defendant **AVERI ROSE DICKINSON** possessed an AR-15 style assault rifle in furtherance of her drug trafficking activities.

9. Defendant **AVERI ROSE DICKINSON** possessed controlled substances for the purposes of further distribution, to include:

- A. Lysergic Acid Diethylamide (LSD), commonly known as “acid,” a Schedule I controlled substance;

- B. 3,4-Methylenedioxymethamphetamine (MDMA), commonly known as “ecstasy” and “molly,” a Schedule I controlled substance;
- C. Oxycodone, a Schedule II controlled substance;.
- D. Cocaine, a Schedule II controlled substance; and,
- E. Ketamine, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), 841(b)(1)(E)(i), and 846.

COUNT 2
(Possession with the Intent to Distribute Cocaine)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(C))

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly and intentionally possess with the intent to distribute Cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 3
(Possession with the Intent to Distribute Oxycodone)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(C))

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly and intentionally possess with the intent to distribute Oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

///

COUNT 4

**(Possession with the Intent to Distribute Ketamine)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(E)(i))**

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly and intentionally possess with the intent to distribute Ketamine, a Schedule III controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(E)(i).

COUNT 5

**(Possession with the Intent to Distribute LSD)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(C))**

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly and intentionally possess with the intent to distribute Lysergic Acid Diethylamide (LSD), a Schedule I controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 6

**(Possession with the Intent to Distribute MDMA)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(C))**

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly and intentionally possess with the intent to distribute 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

///

COUNT 7
(Distribution of Oxycodone)
(21 U.S.C. § 841(a)(1) and 841(b)(1)(C))

On or about March 9, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly and intentionally distribute Oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 8
(Employment or Use of Persons Under 18 Years of Age in Drug Operations)
(21 U.S.C. § 861(a) and 861(b))

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON**, a person at least 18 years of age, did knowingly and intentionally employ, hire, use, persuade, induce, entice, or coerce a person under 18 years of age to distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 861(a) and 861(b).

COUNT 9
(Distribution of a Controlled Substance to Persons Under Age 21)
(21 U.S.C. § 859(a))

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON**, a person at least 18 years of age, did knowingly and intentionally distribute a controlled substance to a person under 21 years of age, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 859(a).

COUNT 10
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)
(18 U.S.C. § 924(c))

On or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON**, in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, Conspiracy to Distribute and Possess with the Intent to Distribute a Controlled Substance, Distribution of a Controlled Substance, Possession with the Intent to Distribute a Controlled Substance, Employment or Use of Persons Under 18 Years of Age in Drug Operations, and Distribution of a Controlled Substance to Persons Under Age 21, in violation of Title 21, United States Code, Sections 841(a)(1), 846, 859(a), and 861(a), as set forth in Counts 1 through 9, did knowingly possess one or more of the following firearm(s), to-wit:

1. a Glock 9mm pistol, serial number BKWT962; and,
2. an AR-15 style assault rifle, with no serial number.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 11
(Maintaining Drug-Involved Premises)
(21 U.S.C. § 856(a)(1) and 856(b))

On or about and between January 2023 and June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly rent, use, and maintain a place located on Scoria Lane, Damascus, Oregon for the purpose of distributing and possessing with the intent to distribute controlled substances, to include:

- A. Lysergic Acid Diethylamide (LSD), commonly known as “acid,” a Schedule I controlled substance;

- B. 3,4-Methylenedioxymethamphetamine (MDMA), commonly known as “ecstasy” and “molly,” a Schedule I controlled substance;
- C. Oxycodone, a Schedule II controlled substance;
- D. Cocaine, a Schedule II controlled substance; and,
- E. Ketamine, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1) and 856(b).

COUNT 12
(Use of Communication Facility to Facilitate a Drug Offense)
(21 U.S.C. § 843(b))

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly and intentionally use a communication facility, to-wit: a cellular telephone, in committing, causing, and facilitating the commission of a felony drug offense, to-wit: Conspiracy to Distribute and Possess with the Intent to Distribute a Controlled Substance, Distribution of a Controlled Substance, Possession with the Intent to Distribute a Controlled Substance, Employment or Use of Persons Under 18 Years of Age in Drug Operations, Distribution of a Controlled Substance to Persons Under Age 21 as set forth in Counts 1 through 9 of this Indictment;

In violation of Title 21, United States Code, Section 843(b) and 843(d)(1).

COUNT 13
(Trafficking in a Counterfeit Drug)
(18 U.S.C. § 2320(a)(4) and 2320(b)(3))

On or about March 9, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did intentionally traffic in a drug and knowingly used counterfeit marks on and in

connection with such drug, to-wit: the defendant distributed counterfeit pills made with Bromazolam, an unscheduled Benzodiazepine, that had been stamped with the Xanax trademark which is used to identify Xanax pills made with Alprazolam, a pharmaceutical product, and such pills were identical to and substantially indistinguishable from the genuine marks in use and registered for those purposes on the principal register in the United States Patent and Trademark Office, and the use of which marks was likely to cause confusion, mistake, and deception regarding said marks;

In violation of Title 18, United States Code, Section 2320(a)(4) and 2320(b)(3).

COUNT 14
(Trafficking in a Counterfeit Drug)
(18 U.S.C. § 2320(a)(4) and 2320(b)(3))

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did intentionally traffic and attempt to traffic in a drug and knowingly used counterfeit marks on and in connection with such good, to-wit: the defendant possessed with the intent to distribute and did distribute counterfeit pills made with Bromazolam, an unscheduled Benzodiazepine, stamped with the imprint "S 90 3," a trademark used to identify Alprazolam pills, a pharmaceutical product, and such pills were identical to and substantially indistinguishable from the genuine marks in use and registered for those purposes on the principal register in the United States Patent and Trademark Office, and the use of which marks was likely to cause confusion, mistake, and deception regarding said marks;

In violation of Title 18, United States Code, Section 2320(a)(4) and 2320(b)(3).

///

COUNT 15
(Sale of a Counterfeit Drug)
(21 U.S.C. §§ 331(i)(3) and 333(b)(8))

On or about March 9, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON**, did knowingly and intentionally sell a counterfeit drug, to-wit: counterfeit Xanax pills marked with the imprint “XANAX” that, instead of containing Alprazolam and being manufactured by a pharmaceutical company, were manufactured by an unknown third-party with Bromazolam, a drug that is not approved for medical use within the United States and the use of which can lead to serious adverse health effects, including death;

In violation of Title 21, United States Code, Sections 331(i)(3) and 333(b)(8).

COUNT 16
(Holding for Sale of a Counterfeit Drug)
(21 U.S.C. §§ 331(i)(3) and 333(b)(8))

On or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly and intentionally hold for sale a counterfeit drug, to-wit: counterfeit Alprazolam pills marked with the imprint “S 90 3” that, instead of containing Alprazolam and being manufactured by a pharmaceutical company, were manufactured by an unknown third-party with Bromazolam, a drug that is not approved for medical use within the United States and the use of which can lead to serious adverse health effects, including death;

In violation of Title 21, United States Code, Sections 331(i)(3) and 333(b)(8).

COUNT 17
(Possession of a Stolen Firearm)
(18 U.S.C. § 922(j))

On or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** knowingly possessed a stolen firearm [ammunition], to-wit: a Glock 9mm pistol,

serial number BKWT962, which had been shipped and transported in interstate or foreign commerce, knowing and having reasonable cause to believe the firearm was stolen;

In violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

COUNT 18
(Using the Internet to Advertise the Sale of Controlled Substances)
(21 U.S.C. § 843(c)(2)(A) and 843(d)(1))

On or about January 2023, the exact date being unknown to the Grand Jury, and continuing through on or about June 14, 2023, within the District of Oregon, defendant **AVERI ROSE DICKINSON** did knowingly and intentionally use the Internet to advertise the sale of, and offer to sell and distribute, various controlled substances in violation of federal law, to-wit:

- A. Lysergic Acid Diethylamide (LSD), commonly known as “acid,” a Schedule I controlled substance;
- B. 3,4-Methylenedioxymethamphetamine (MDMA), commonly known as “ecstasy” and “molly,” a Schedule I controlled substance;
- C. Oxycodone, a Schedule II controlled substance;.
- D. Cocaine, a Schedule II controlled substance; and,
- E. Ketamine, a Schedule III controlled substance.

In violation of Title 21, United States Code, Section 843(c)(2)(A) and 843(d).

FORFEITURE ALLEGATION
(Controlled Substance Offenses)

Upon conviction of an offense in Counts 1 through 9, and Counts 11, 12, and 18 defendant **AVERI ROSE DICKINSON** shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a

result of the aforesaid violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations.

SECOND FORFEITURE ALLEGATION
(Firearm Offense)

Upon conviction of the offense in Count 10, defendant **AVERI ROSE DICKINSON** shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the firearm and ammunition involved in that offense, including without limitation: an AR-15 style assault rifle, with no serial number, and the associated ammunition.

THIRD FORFEITURE ALLEGATION
(Counterfeiting Offense)

Upon conviction of an offense in Count 13 and/or 14, defendant **AVERI ROSE DICKINSON** shall forfeit to the United States, pursuant to 18 U.S.C. § 2323, any article, the making or trafficking of which is, prohibited under 18 U.S.C. § 2320, as alleged; any property used or intended to be used, in any manner or part to commit or facilitate the commission of the offense alleged; and, any property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of the offense alleged.

///

///

///

FOURTH FORFEITURE ALLEGATION
(Misbranding Offense)

Upon conviction of an offense alleged in Count 15 and/or 16, defendant **AVERI ROSE DICKINSON** shall forfeit to the United States pursuant to 18 USC § 982(a)(7), property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense.

Dated: July 12th, 2023.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT
United States Attorney


SCOTT M. KERIN, OSB # 965128
Assistant United States Attorney